
“FREQUENTLY ASKED QUESTIONS”

GENERAL MANAGEMENT PLAN / WILDERNESS STUDY / ENVIRONMENTAL IMPACT STATEMENT (GMP/WS/EIS) SLEEPING BEAR DUNES NATIONAL LAKESHORE

Questions and answers will be added to this document from time to time, as we receive more comments and questions from you. The date that questions and answers are added will be clearly indicated. You may note that we have provided more detail on some topics, such as wilderness, when compared to earlier versions. This is an expected outcome of planning, as more information becomes available or more analysis is conducted.

June 1, 2006:

How did the National Lakeshore become involved with wilderness?

The 1970 legislation that authorized creation of the National Lakeshore (P.L. 91-479) stated that “Within four years . . . the Secretary of the Interior shall . . . report to the President . . . his recommendation as to the suitability or nonsuitability of any area within the lakeshore for preservation as wilderness . . .” In response to this legislation, a *1975 Wilderness Recommendation* was prepared by the NPS, which included 35,060 acres in six areas as “potential” wilderness. It did not recommend any lands for full wilderness status at that time because of nonconforming uses and the lack of federal ownership. No detailed maps of the acreage were produced. The *1975 Wilderness Recommendation* was forwarded through the Department of the Interior but was never officially transmitted from the President to Congress.

The *1975 Wilderness Recommendation* was reviewed in the late 1970s as part of the *1979 General Management Plan*. The *1979 General Management Plan* recommended excluding the Sleeping Bear plateau unit because of vehicle use on the Hart Nature Trail (Stocking Scenic Drive). It also excluded a “public transportation” corridor on South Manitou Island and several areas of private land on the mainland and road access to them. Based on the *1979 General Management Plan*, a *1981 Wilderness Recommendation* proposed 7,128 acres of recommended wilderness and 23,775 acres of “potential” wilderness in five areas. Best available information suggests that the *1981 Wilderness Recommendation* was approved by the NPS Director, but never transmitted from the Assistant Secretary to the Secretary of the Interior.

In 1982 Congress passed an amendment to the park enabling legislation (P.L. 97-361), stating that the President was to, no later than June 1, 1983, recommend wilderness suitability to the Congress. In May of 1983, the Director transmitted the *1981 Wilderness Recommendation* again, through the Assistant Secretary to the Department Legislative Counsel. It appears that it was never formally transmitted to the President. In the 1982 amendment, Congress also required that areas described in the *1981 Wilderness Recommendation* be administered to maintain their presently existing wilderness character “until Congress determines otherwise.” *NPS Management Policies* in place then and since that time also require such management, which has now been occurring for 25 years.

As part of this *General Management Plan/Wilderness Study* process, the National Park Service will develop a range of wilderness boundary alternatives. The lands proposed for wilderness in the *1981 Wilderness Recommendation* and addressed by Congress in the 1982 amendment will be included in the *General Management Plan/Wilderness Study* in the “No Action” alternative (current management) as a baseline for comparison. Other alternatives will present options for varying amounts of wilderness. Ultimately, whatever area is proposed for wilderness in the selected alternative will be transmitted to the Secretary of the Interior for recommendation to the President, through the process described below.

It is important to note, however, that the 1982 amendment requires that areas proposed in the *1981 Wilderness Recommendation* “until Congress determines otherwise.” So, regardless of the alternative selected in the *General Management Plan*, all lands included in the proposed wilderness area referenced by the 1982 amendment (P.L. 97-361) will continue to be managed to maintain their wilderness character “until Congress determines otherwise.”

What is the process for conducting a wilderness study?

A wilderness study is a formal, thorough analysis of lands eligible for wilderness consideration. The study evaluates which lands should be managed for wilderness values, describing various alternatives for wilderness and examining what the impacts of each would be. A wilderness study may identify lands that do not qualify for immediate designation as wilderness due to temporary, non-conforming, or incompatible conditions, but that would eventually become wilderness when these conditions are removed. These lands are described as “potential” wilderness.

A wilderness study results in a proposal by the National Park Service that the Secretary of the Interior transmit a wilderness recommendation to the President. This proposal may be for some, all, or none of the eligible areas to be recommended as wilderness or potential wilderness. During the *Wilderness Study*, the National Park Service invites full public participation, studies different wilderness alternatives, publishes notices in the *Federal Register*, conducts a public hearing, and prepares an *Environmental Impact Statement (EIS)*, as required by National Environmental Policy Act (NEPA) regulations. The *Draft Environmental Impact Statement* must contain a range of wilderness alternatives, including a preferred alternative. Once comments on the *Draft Environmental Impact Statement* are considered, the *Final Wilderness Study/Environmental Impact Statement* is produced and a Record of Decision issued. Then the *Final Wilderness Study/Environmental Impact Statement* and Record of Decision are transmitted to the Secretary of the Interior, who then recommends it to the President, for submittal to Congress.

Why does the planning process take so long?

General management plans typically take three to five years to prepare, depending on the complexity of the park. The process includes numerous public involvement steps; data gathering; environmental impact analysis; writing, editing and formatting; NPS document reviews; and printing. This current *GMP* process also includes a *Wilderness Study*, which makes the three-year schedule more ambitious for this complex park.

Are you going to be closing any roads?

Benzie and Leelanau counties control almost all of the road rights-of way in the park and closure of those roads is beyond NPS authority. No county roads could be closed unless Benzie and Leelanau Counties decided to abandon them. We intend to closely involve the road commissions from both counties in the planning process. The majority of road-related comments received in response to Newsletter #1 supported maintaining existing road access, though there were several that suggested closing roads as well. The *General Management Plan* will address these comments by examining how roads support or impact park resources and visitor experiences, and determining which roads are needed to serve NPS visitor or administrative purposes. This information will: 1) provide management direction for NPS-owned roads, and 2) provide information for the counties to consider in their road management and maintenance programs.

How did you develop the purpose and significance statements?

The purpose statement conveys the reasons for which the National Lakeshore was set aside as part of the national park system. It is grounded in a thorough analysis of National Lakeshore legislation and legislative history. Significance statements capture the essence of the National Lakeshore's importance to the nation's natural and cultural heritage. They describe the National Lakeshore's distinctiveness and describe why an area is important within regional, national, and global contexts. Significance statements help managers focus their efforts and limited funding on protection and enjoyment of attributes that are directly related to the purpose of the National Lakeshore, the mission of the National Park Service, and the will of Congress. The planning team considered comments received during scoping and again reviewed the 1970 park enabling legislation (P.L. 91-479) and legislative history to develop the purpose and significance statements included in this newsletter. The planning team believes that the revised purpose statement reflects Congress' intent when it established the National Lakeshore.

Are there other laws and regulations that direct park management, other than the law that created the National Lakeshore?

All park units are required by the National Park Service Organic Act of 1916, which created the National Park Service, to manage park resources so as to leave them "unimpaired for the enjoyment of future generations." Park units are also required to meet the provisions of many other federal laws such as the National Historic Preservation Act, the Endangered Species Act, and the National Environmental Policy Act. In addition, there are a number of "special mandates," which are laws or regulations that are more specific to the National Lakeshore. These are addressed more fully in a separate document available on the park's website.

How can I view public comments on the newsletters?

Public comments on the newsletters are considered pre-decisional information. We take every precaution to protect the privacy of those who comment. Comments will always be *summarized* and made available to the public in future documents (newsletters and the draft plan). The "Summary of Comments on Newsletter 1 – May 2006" is available by linking on the park webpage. Individual public comments are collected but are not available for public viewing until *after* a final decision is reached by the NPS Regional Director with the signing of a Record of Decision.

Does completing the GMP guarantee future funding and implementation?

No. As a long-term vision for management of the National Lakeshore, the GMP will provide “big picture” guidance. Once the GMP is completed, future action plans, which “tier” off the GMP, will be prepared and will help support park requests for funding for a variety of activities. Although a GMP provides the analysis and justification for future funding, the plan in no way guarantees that money will be forthcoming.

FEBRUARY 1, 2006: Note: Some minor changes have been made.

Is this a brand new General Management Plan (GMP) process or a restart of the process stopped in 2002?

The new GMP/Wilderness Study/Environmental Impact Statement (GMP/WS/EIS) process will be “brand new.” It will take into consideration resource information and public comments gathered from the past GMP effort, but it will be a new start.

Why do a new GMP now?

Park planning is an ongoing process, and general management planning is the broadest level of decision making for national parks. GMPs are required for all parks and are intended to guide management direction for 20+ years. The current GMP was completed in 1979 and is no longer adequate.

Will the comments submitted during the initial GMP planning phases (1999-2002) be considered in the new start?

Yes. We will certainly review the public comments from the last GMP effort. Good planning always includes a review of past and concurrent planning efforts.

What are the planning steps?

The general planning steps include: scoping (gathering ideas for the “scope” of the project), developing preliminary alternatives, refining preliminary alternatives, preparing a draft plan and revising and preparing a final plan. A more detailed listing of the steps is identified in each Newsletter and is also available on the park’s website at www.nps.gov/slbe. Public comments will be solicited throughout the planning process, which will take about three years to complete.

How will this GMP process be different from the previous planning effort?

The biggest difference is that this process will include a Wilderness Study component. This means that changes to the existing wilderness proposal will be considered among the alternatives. Also, we will increase opportunities for public input. The public will be involved at several points. We anticipate frequent feedback loops so that people can see their input reflected in the issues identified, alternatives crafted, and decisions made. Visit the park’s website at www.nps.gov/slbe for the latest information on the project.

How will people be able to give their input, and how will it be used?

Public input will be sought through a variety of methods such as letters, press releases, newsletters, websites, workshops and public meetings. Information gathered through these methods will be incorporated into planning at each step. Public comments will be carefully reviewed, grouped as appropriate, and considered by the planning team. The GMP will identify alternatives that were considered but not carried forward for detailed analysis. Suggestions that are outside the scope of the GMP have been identified in the Summary of Comments.

The park's website (www.nps.gov/slbe) will contain links to review documents and additional information about the project.

Public open houses were held on February 14-15 and March 2, 2006. Future public open houses and meetings will be scheduled during the warmer months.

Who is on the planning team for this project?

As identified on page 5 of Newsletter #1, the team includes:

National Lakeshore:

Dusty Shultz, Superintendent
 Tom Ulrich, Assistant Superintendent
 Michael Duwe, Environmental Specialist/Planner
 Lee Jameson, Facility Manager
 Larry Johnson, Chief Ranger
 Dan Kriebler, Administrative Officer
 Lisa Myers, Chief, Interpretation and Visitor Services
 Steve Yancho, Chief, Natural Resources
 Bruce Huffman, Public Information Officer (Added June 2006)

Midwest Regional Office:

Sandra Washington, Chief, Planning and Compliance

Denver Service Center:

Miki Stuebe, Project Manager (Changed June 2006)
 Craig Cellar, Cultural Resource Specialist
 Nola Chavez, Landscape Architect

Of course, members of the public, through their input in the ways mentioned above, will be involved in the development of alternatives and the planning process.

There is a difference between those who are consulted and those who participate in the actual planning. Previous planning processes did not include stakeholders as participants. Will this process be the same?

All who participate in the public input process are actually participating in the planning process. A distinction is drawn between those who participate as members of the public and those who are members of the planning team that review public input, evaluates options, and selects resulting alternatives. This process is basically the same for all federal planning, including previous efforts at this park. The formal team (described above) and consultants (private contractors and/or governmental representatives) provide specific data or research in support of the planning effort. Stakeholders, also

referred to as interested publics, are actively involved in the planning process, but not as members of the planning team.

How will questions and issues about recommended wilderness areas be addressed?

They will be addressed in the Wilderness Study component of the document. Any suggested alternatives for wilderness may be considered.

The 1982 Congressional amendment to the park's enabling legislation requires that the NPS manage the lands in the existing Wilderness Recommendation as wilderness. How can a new GMP change this management?

Because of how the 1982 law addresses the *1981 Wilderness Recommendation*, anything in the GMP/WS/EIS that changes the existing wilderness boundaries cannot be implemented until such time that Congress passes new legislation on wilderness within the National Lakeshore. We cannot change management of those lands identified as wilderness until Congress takes action.

Will the *1981 Wilderness Recommendation* be opened for full public review and how will this be done?

The Wilderness Study, a component of the GMP/WS/EIS package, will be open for full public review. This will be a new study, as mentioned above, and we will review the *1981 Wilderness Recommendation* for any pertinent information. Good planning always includes a review of past and concurrent planning efforts. The process will follow all requirements of the National Environmental Policy Act (NEPA) and the Wilderness Act. As we move through the process, the public will be asked for input at many phases.

How would any changes to the 1981 Wilderness Boundary be made? Will they be permanent and binding? If not, what would be required to make them so?

Any changes to the boundaries set in the *1981 Wilderness Recommendation* that might be proposed as a result of this process would be reviewed by the National Park Service Director and forwarded by the Department of the Interior and the Office of Management and Budget to Congress for approval. Once any wilderness boundary changes are passed by Congress, the park would then change our management based upon the new boundaries. Once the Congressional bill is signed into law by the President, the changes become permanent and binding (Designated Wilderness).

Will any of the GMP alternatives include a net increase/decrease of wilderness at Sleeping Bear Dunes National Lakeshore?

This has yet to be determined. NEPA requires that the existing boundaries be included as one alternative, called the "No-Action" alternative. However, alternatives could also include lesser or greater amounts than in the *1981 Wilderness Recommendation*. Information gathered through public input will be analyzed and incorporated into a full range of alternatives.

At meetings with various groups during the past few years, the National Park Service had said that some areas within the recommended wilderness boundary could be "cherry-

stemmed” out from the wilderness boundary as “minor modifications.” However, now you are talking about a Wilderness Study? Why?

“Cherry-stemming” is a method of excluding “non-conforming” uses such as roads from areas proposed as wilderness. Our research determined that minor modifications, such as cherry-stemming, could be made to the boundaries described in the *1981 Wilderness Recommendation*, but that the *total* acres of proposed wilderness could not change significantly without violating the 1982 legislation. Based on our many presentations made to groups in 2004 and 2005, however, the majority of participants favored a comprehensive Wilderness Study, rather than minor modifications.

The Wilderness Study, as part of the GMP and EIS package, will recommend alternatives for wilderness boundaries based on a thorough analysis of wilderness resources and values, potential impacts, and public review and comment.

Why is the Wilderness Study being combined with the GMP? I thought the wilderness issues were going to be resolved first, before the start of a new GMP.

The NPS initially recommended addressing wilderness and then a GMP in sequence. However, in order to complete the process in a timely and cost-effective fashion, we are now proceeding with a combined GMP/WS/EIS. Conducting these planning efforts sequentially would likely stretch out the length of time needed for completion to six years or more, and would nearly double the cost as well. Also, no separate fund source is available to conduct a stand-alone Wilderness Study at this time.

What is an Environmental Impact Statement?

An Environmental Impact Statement (EIS) is a detailed environmental analysis document that is prepared when a proposal or alternatives have the potential for significant impact on the environment. In the National Park Service, GMPs and Wilderness Studies are almost always accompanied by an EIS. It will not be a separate document.